

MITCHELL S. BISSON, ESQ.
Nevada Bar No. 011920
LAW OFFICES OF MITCHELL S. BISSON
911 N. Buffalo Dr., Ste. 202
Las Vegas, NV 89128
Tel. No.: (702) 602-4990
Email: Mbisson@BissonLegal.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

REATHA BELLAS, an individual;

Plaintiff,

vs.

ROBERT KAHN, as Trustee of the Robert
B. Kahn Revocable Trust; et al.

Defendants.

CASE NO.: 2:24-cv-00245-RFB-MDC

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF'S RESPONSE TO:
[37] DEFENDANT RANDY SANTA'S MOTION
TO DISMISS, OR IN THE ALTERNATIVE,
MOTION FOR SUMMARY JUDGMENT**

Plaintiff Reatha Bellas ("Plaintiff"), by and through her counsel of record, Mitchell S. Bisson, Esq., and Defendant Randy Santa ("Defendant"), by and through its counsel of record, A.J. Kung, Esq., hereby jointly submit this stipulation and order to extend Plaintiff's deadline to file its Response to Defendant's Motion to Dismiss, or in the alternative, Motion for Summary Judgment (ECF No. 37, filed and served on July 26, 2024), from August 9, 2024 to August 30, 2024.

Pursuant to meet and confer efforts by the Parties, this is a first and only request for an extension of Plaintiff's Response and/or Opposition deadline. The Plaintiff believes this motion can best be responded to and replied to *after* the upcoming August 13, 2024 Deposition of Plaintiff and after the evidentiary hearing set for August 20, 2024 where a better picture of the facts involved in this matter will be gleaned. As such, Plaintiff requested an extension of time to respond to the motion from Defendant Santa and Defendant Santa agreed to provide one.

1 Nothing herein shall affect Defendant's right(s) to file and serve any necessary Reply to any
2 Response and/or Opposition filed by Plaintiffs. All associated moving paper deadlines shall be reset
3 pursuant to any extension ordered by the Court.

4
5 Dated: August 9, 2024

THE LAW OFFICES OF MITCHELL
S. BISSON

6
7
8 By: /s/ MITCHELL S. BISSON
MITCHELL S. BISSON, ESQ.
9 ATTORNEY FOR PLAINTIFF

10
11 Dated: August 13, 2024

KUNG AND BROWN

12
13
14 By: /s/ A.J. Kung, Esq.
A.J. KUNG, ESQ.
15 Attorney for Defendant Randy Santa

16
17 **ORDER**

18 Based upon the stipulation of the Parties, and good cause appearing,

19 **IT IS SO ORDERED.**

20 **DATED:** August 13, 2024.

21
22 

23 **RICHARD F. BOULWARE, II**
24 **UNITED STATES DISTRICT JUDGE**